

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

Charlottesville Division

ELIZABETH SINES, et al.,
Plaintiffs,

v.

JASON KESSLER, et al.,
Defendants.

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Case No. 3:17-cv-00072-NKM

ANSWER AND GROUNDS OF DEFENSE TO SECOND AMENDED COMPLAINT

COME NOW Defendants Michael Hill, Michael Tubbs, and League of the South, Inc., hereinafter Defendants, by counsel, and state the following Answer and Grounds of Defense to the Second Amended Complaint of Plaintiff Elizabeth Sines, *et al.*

FIRST DEFENSE

1. Denied.

2. Defendants lack sufficient information to admit or deny the allegations of Paragraph 2 and, therefore, demand strict proof thereof.

3. Denied.

4. Defendants deny the allegations of the first four sentences of Paragraph 4. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 4 and, therefore, demands strict proof thereof.

5. Denied.

6. Defendants deny the allegations of the first sentence of Paragraph 6. Defendants lack sufficient information to admit or deny the allegations of the second sentence of Paragraph 6 and, therefore, demands strict proof thereof.

7. Defendants are not required to admit or deny the allegations of the first and second sentences of Paragraph 7 because they merely characterize the Second Amended Complaint. Defendants lack enough information to admit or deny the allegations of the third sentence of Paragraph 7 and, therefore, demands strict proof thereof.

8. Defendants are not required to admit or deny the allegations of Paragraph 8 because they merely state legal conclusions.

9. Defendants are not required to admit or deny the allegations of Paragraph 9 because they merely state legal conclusions.

10. Defendants lack sufficient information to admit or deny the allegations of Paragraph 10 and, therefore, demands strict proof thereof.

11. Defendants deny the allegations of the sixth sentence of Paragraph 11 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 11 and, therefore, demands strict proof thereof.

12. Defendants deny the allegations of the third sentence of Paragraph 12 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 12 and, therefore, demands, therefore, strict proof thereof.

13. Defendants lack sufficient information to admit or deny the allegations of Paragraph 13 and demands, therefore, strict proof thereof.

14. Defendants deny any allegation that they planned the events of August 12, 2017. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph and, therefore, demands strict proof thereof.

15. Defendants deny any allegation that they planned the events of August 12, 2017. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph and, therefore, demands strict proof thereof.

16. Defendants deny the allegations of the last sentence of Paragraph 16 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 16 and, therefore, demands strict proof thereof.

17. Defendants lack sufficient information to admit or deny the allegations of Paragraph 17 and, therefore, demands, therefore, strict proof thereof.

18. Defendants lack sufficient information to admit or deny the allegations of Paragraph 17 and, therefore, demands, therefore, strict proof thereof.

19. Defendants lack sufficient information to admit or deny the allegations of Paragraph 19 and, therefore, demands strict proof thereof.

20. Defendants are not required to admit or deny the allegations of Paragraph 20 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 20 and, therefore, demands strict proof thereof.

21. Defendants are not required to admit or deny the allegations of Paragraph 21 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 20 and, therefore, demands strict proof thereof.

22. Defendants are not required to admit or deny the allegations of Paragraph 22 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 22 and, therefore, demands strict proof thereof.

23. Defendants deny those allegations in the second sentence of Paragraph 23 that allege they were part of a conspiracy. Defendants are not required to admit or deny the remaining

allegations of Paragraph 23 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 23 and, therefore, demands strict proof thereof.

24. Defendants are not required to admit or deny the allegations of Paragraph 24 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 24 and, therefore, demands strict proof thereof.

25. Defendants are not required to admit or deny the allegations of Paragraph 25 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 25 and, therefore, demands strict proof thereof.

26. Defendants are not required to admit or deny the allegations of Paragraph 26 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 26 and, therefore, demands strict proof thereof.

27. Defendants are not required to admit or deny the allegations of Paragraph 27 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 27 and, therefore, demands strict proof thereof.

28. Defendants are not required to admit or deny the allegations of the first and second sentences of Paragraph 28 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny said allegations of Paragraph 28 and, therefore, demands strict proof thereof. Defendants admits the allegations of the third sentence of Paragraph 28.

29. Defendants are not required to admit or deny the allegations of the first and second sentences of Paragraph 28 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny said allegations and therefore, demands strict proof thereof.

30. Defendants deny the allegations of the last sentence of Paragraph 30 to the extent that they apply to Defendants. Defendants are not required to admit or deny the allegations of the remaining allegations of Paragraph 30 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 30 and, therefore, demand strict proof thereof.

31. Defendants are not required to admit or deny the allegations of Paragraph 31 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 31 and, therefore, demands strict proof thereof.

32. Defendants are not required to admit or deny the allegations of Paragraph 32 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 32 and, therefore, demands strict proof thereof.

33. Defendants are not required to admit or deny the allegation of Paragraph 33 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 33 and, therefore, demands strict proof thereof.

34. Defendants admits the allegations in the first, third, and fourth sentences of Paragraph 34. Defendants deny the allegations in the remaining sentences of Paragraph 34.

35. Defendants admit the allegations in sentence 1 of Paragraph 35. Defendants deny the allegations in the remaining sentences of Paragraph 35.

36. Defendants deny the allegations in Paragraph 36.

37. Defendants are not required to admit or deny the allegations of Paragraph 37 because they are not directed to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 37 and, therefore, demands strict proof thereof.

38. Defendants are not required to admit or deny the allegations of Paragraph 38 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 38 and, therefore, demands strict proof thereof.

39. Defendants lack sufficient information to admit or deny the allegations of Paragraph 39 and, therefore, demands strict proof thereof. To the extent an answer is required, Defendants deny the allegations in Paragraph 39.

40. Defendants are not required to admit or deny the allegations of Paragraph 40 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 40 and, therefore, demands strict proof thereof.

41. Defendants are not required to admit or deny the allegations of Paragraph 41 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 41 and therefore, demands strict proof thereof.

42. Defendants are not required to admit or deny the allegations of Paragraph 42 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 41 and therefore, demands strict proof thereof.

43. Defendants are not required to admit or deny the allegations of Paragraph 43 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 43 and, therefore, demands strict proof thereof.

44. Defendants deny the allegations of the last sentence of Paragraph 44 to the extent that they apply to them. Defendants are not required to admit or deny the remaining allegations

of Paragraph 44 because they do not apply to them. In addition, Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 44 and, therefore, demands strict proof thereof.

45. Denied.

Captions I and A on page 19: Defendants deny the allegations set forth in Caption I and Caption A on page 19. Defendants lack sufficient information to admit or deny the allegation about Defendants Anglin and, therefore, demands strict proof thereof.

46. Denied.

47. Defendants deny the allegations of the first sentence of Paragraph 47 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations in said sentence and, therefore, demands strict proof thereof. Defendants admit the allegations of the second sentence of Paragraph 47.

48. Defendants lack sufficient information to admit or deny the allegations in Paragraph 48.

49. Defendants lack sufficient information to admit or deny the allegations in Paragraph 49.

50. Defendants lack sufficient information to admit or deny the allegations in the first, second sentences and third sentences of Paragraph 50 and, therefore, demands strict proof thereof. Defendants are not required to admit or deny the allegations of the fourth, fifth and sixth sentences of Paragraph 50 because they do not constitute allegations of fact, but merely opinions.

51. Defendants lack sufficient information to admit or deny the allegations of Paragraph 51 and, therefore, demands strict proof thereof.

52. Defendants lack sufficient information to admit or deny the allegations in Paragraph 52.

53. Defendants deny that they have been a conspirator in any matter. Defendants admit that, after the fact, persons have referred to the events of May 13 as "Charlottesville 1.0".

54. Defendants lack sufficient information to admit or deny the allegations in Paragraph 53.

55. Defendants lack sufficient information to admit or deny the allegations of Paragraph 55 and, therefore, demands strict proof thereof.

56. Defendants lack sufficient information to admit or deny the allegations of Paragraph 56 (including those in the footnote) and, therefore, demands strict proof thereof.

57. Defendants lack sufficient information to admit or deny the allegations of Paragraph 57 and, therefore, demands strict proof thereof.

58. Defendants lack sufficient information to admit or deny the allegations of Paragraph 58 and, therefore, demands strict proof thereof.

59. Denied.

Caption B at page 22: Defendants deny the allegations contained in Caption B on page 22. Defendants lack sufficient information to admit or deny that Defendants Anglin made the quoted statements and, therefore, demands strict proof thereof.

60. Defendants lack sufficient information to admit or deny the allegations of Paragraph 61 that relate to the content of the referenced permit application. Defendants deny the remaining allegations of Paragraph 61.

61. Defendants lack sufficient information to admit or deny the allegations of Paragraph 62 and, therefore, demands strict proof thereof.

62. Denied.

63. Defendants lack sufficient information to admit or deny the allegations of Paragraph 62 and, therefore, demands strict proof thereof.

64. Defendants lack sufficient information to admit or deny the allegations of Paragraph 64 and, therefore, demands strict proof thereof.

65. Defendants lack sufficient information to admit or deny the allegations of Paragraph 65 and, therefore, demands strict proof thereof.

66. Denied.

67. Denied.

68. Defendants deny the allegations of Paragraph 68 to the extent that they apply to them. Defendants lack sufficient information to admit or deny all remaining allegations of Paragraph 68 and, therefore, demands strict proof thereof.

69. Defendants deny the allegations of Paragraph 69 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 69 and, therefore, demands strict proof thereof.

70. Defendants lack sufficient information to admit or deny the allegations of Paragraph 69 and, therefore, demands strict proof thereof.

71. Defendants deny the allegations of Paragraph 71 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 71 and, therefore, demands strict proof thereof.

72. Defendants deny any allegation that they "moderated, reviewed, directed and managed" the referenced forum, any allegation that he was a "moderator" of the referenced group, any allegation that he was a conspirator and any allegation that they had any access to

and/or used said forum due to said alleged status. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 73 and, therefore, demands strict proof thereof.

73. Defendants deny the allegations of Paragraph 72 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 72 and, therefore, demands strict proof thereof.

74. Defendants deny the allegations of Paragraph 74 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 74 and, therefore, demands strict proof thereof.

75. Defendants deny any allegation that they set up any of said channels. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 76 and, therefore, demands strict proof thereof.

76. Defendants deny the allegations of Paragraph 75 to the extent that they apply to them, including any allegation that they were a conspirator. Defendants admit that a League of the South channel existed on Discord. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 75 and, therefore, demands strict proof thereof.

77. Defendants deny the allegations of Paragraph 77 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 77 and, therefore, demands strict proof thereof.

78. Defendants lack sufficient information to admit or deny the allegations of Paragraph 78 and demands strict proof thereof.

79. Defendants lack sufficient information to admit or deny the allegations of Paragraph 79 and, therefore, demands strict proof thereof.

80. Defendants deny the allegations of Paragraph 80 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 80 and, therefore, demands strict proof thereof.

81. Defendants deny the allegations of Paragraph 81 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 81 and, therefore, demands strict proof thereof.

82. Defendants lack sufficient information to admit or deny the allegations of Paragraph 82 and, therefore, demands strict proof thereof.

83. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 83 and, therefore, demands strict proof thereof.

84. Defendants lack sufficient information to admit or deny the allegations of Paragraph 84 and, therefore, demands strict proof thereof.

85. Defendants lack sufficient information to admit or deny the allegations of Paragraph 85 and, therefore, demands strict proof thereof.

Caption C at page 29: Defendants deny the allegations contained in Caption C at page 29. Defendants lack sufficient information to admit or deny the allegations, if any are made, with respect to the quotation.

86. Defendants lack sufficient information to admit or deny the allegations of Paragraph 86 and, therefore, demands strict proof thereof.

87. Defendants lack sufficient information to admit or deny the allegations of Paragraph 87 and, therefore, demands strict proof thereof.

88. Defendants lack sufficient information to admit or deny the allegations of Paragraph 88 and, therefore, demands strict proof thereof.

89. Defendants lack sufficient information to admit or deny the allegations of Paragraph 89 and, therefore, demands strict proof thereof.

90. Defendants lack sufficient information to admit or deny the allegations of Paragraph 90 and, therefore, demands strict proof thereof.

91. Defendants lack sufficient information to admit or deny the allegations of Paragraph 91 and, therefore, demands strict proof thereof.

92. Defendants lack sufficient information to admit or deny the allegations in Paragraph 92 and, therefore, demands strict proof thereof.

93. Defendants admit the allegation in the first sentence in Paragraph 93. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 93 and, therefore, demands strict proof thereof.

94. Defendants lack sufficient information to admit or deny the allegations of Paragraph 94 and, therefore, demands strict proof thereof.

95. Defendants lack sufficient information to admit or deny the allegations in the second paragraph and, therefore, demands strict proof thereof.

96. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 96 and, therefore, demands strict proof thereof.

97. Defendants lack sufficient information to admit or deny the allegations of Paragraph 97 and, therefore, demands strict proof thereof.

98. Admitted.

99. Defendants are not required to admit or deny the allegations of Paragraph 100 because they merely characterize a document that speaks for itself. In addition, Defendants lack

sufficient information to admit or deny the allegations of Paragraph 100 and, therefore, demands strict proof thereof.

100. Defendants are not required to admit or deny the allegations of Paragraph 100 because they merely characterize a document that speaks for itself. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 100 and, therefore, demands strict proof thereof.

101. Defendants are not required to admit or deny the allegations of Paragraph 101 because they merely characterize a document that speaks for itself. In addition, Defendants lack sufficient information to admit or deny the allegations of Paragraph 101 and, therefore, demands strict proof thereof.

102. Defendants deny the allegations of Paragraph 102 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 102 and, therefore, demands strict proof thereof.

103. Defendants deny the allegations of Paragraph 104 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 103 and, therefore, demands strict proof thereof.

104. Defendants deny the allegations of Paragraph 104 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 104 and, therefore, demands strict proof thereof.

105. Defendants deny the allegations of Paragraph 104 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 105 and, therefore, demands strict proof thereof.

106. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 106 and, therefore, demands strict proof thereof.

107. Defendants deny the allegations of Paragraph 104 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 107 and, therefore, demands strict proof thereof.

108. Defendants deny any allegation that he was a conspirator. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 108 and, therefore, demands strict proof thereof.

109. Defendants deny the allegations of Paragraph 109 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 109 and, therefore, strict proof thereof.

110. Defendants lack sufficient information to admit or deny the allegations of Paragraph 110 and, therefore, demands strict proof thereof.

111. Defendants lack sufficient information to admit or deny the allegations of Paragraph 111 and, therefore, demands strict proof thereof.

112. Defendants lack sufficient information to admit or deny the allegations of Paragraph 112 and, therefore, demands strict proof thereof.

113. Defendants lack sufficient information to admit or deny the allegations of Paragraph 113 and, therefore, demands strict proof thereof.

114. Defendants lack sufficient information to admit or deny the allegations of Paragraph 114 and, therefore, demands strict proof thereof.

115. Defendants lack sufficient information to admit or deny the allegations of Paragraph 115 and, therefore, demands strict proof thereof.

116. Defendants lack sufficient information to admit or deny the allegations of Paragraph 116 and, therefore, demands strict proof thereof.

117. Defendants lack sufficient information to admit or deny the allegations of Paragraph 117 and, therefore, demands strict proof thereof.

118. Defendants lack sufficient information to admit or deny the allegations of Paragraph 118 and, therefore, demands strict proof thereof.

119. Defendants deny the allegations of Paragraph 119 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 119 and, therefore, demands strict proof thereof. Alternatively, Defendants are not required to admit or deny the allegations of said sixth sentence because they merely characterize a publication that speaks for itself

120. Defendants lack sufficient information to admit or deny the allegations of the sixth sentence of Paragraph 120 and, therefore, demands strict proof thereof..

121. Defendants lack sufficient information to admit or deny the allegations of Paragraph 121 and, therefore, demands strict proof thereof.

122. Defendants deny the allegations of the first sentence of Paragraph 122 to the extent that they purport to apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 122 and, therefore, demands strict proof thereof.

123. Defendants lack sufficient information to admit or deny the allegations of Paragraph 123 and, therefore, demands strict proof thereof. Alternatively, Defendants are not required to admit or deny said allegations because they merely characterize a document that speaks for itself.

Caption D at page 44: Defendants deny the allegations in Caption D at page 44 to the extent that they purport to apply to them.

124. Defendants deny the allegations of Paragraph 124 to the extent that they purport to apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 124 and, therefore, demands strict proof thereof.

125. Defendants deny the allegations of Paragraph 124 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of paragraph 125 and, therefore, demands strict proof thereof, including the allegations in footnote 8.

126. Defendants lack sufficient information to admit or deny the allegations of Paragraph 126 and, therefore, demands strict proof thereof.

127. Defendants lack sufficient information to admit or deny the allegations of Paragraph 127 and, therefore, demands strict proof thereof.

128. Defendants lack sufficient information to admit or deny the allegations of Paragraph 128 and, therefore, demands strict proof thereof.

129. Defendants lack sufficient information to admit or deny the allegations of Paragraph 129 and, therefore, demands strict proof thereof.

130. Defendants deny the allegations of the first sentence of Paragraph 130 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 130 and, therefore, demands strict proof thereof.

Caption E on page 46: Defendants deny the allegations of Caption E on page 46 to the tent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of this caption and, therefore, demands strict proof thereof.

131. Defendants lack sufficient information to admit or deny the allegations of Paragraph 131 and, therefore, demands strict proof thereof.

132. Defendants lack sufficient information to admit or deny the allegations of Paragraph 132 and, therefore, demands strict proof thereof.

133. Defendants lack sufficient information to admit or deny the allegations of Paragraph 133 and, therefore, demands strict proof thereof.

134. Defendants lack sufficient information to admit or deny the allegations of Paragraph 134 and, therefore, strict proof thereof.

135. Defendants deny the allegations of Paragraph 135 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 135 and, therefore, demands strict proof thereof.

136. Defendants deny any allegation that they were a conspirator. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 136 and, therefore, strict proof thereof.

137. Defendants deny the allegations of the first sentence of Paragraph 137 to the extent that they apply to them any allegation. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 137 and, therefore, demands strict proof thereof.

138. Defendants deny the allegations of the first and second sentences of Paragraph 138 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 138 and, therefore, demands strict proof thereof.

139. Defendants deny the allegations of the first sentence of Paragraph 139 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of this Paragraph 139 and, therefore, demands strict proof thereof.

140. Defendants deny the allegations of the second sentence of Paragraph 140 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 140 and, therefore, demands strict proof thereof.

141. Defendants lack sufficient information to admit or deny the allegations in Paragraph 141 and, therefore, demands strict proof thereof.

142. Defendants deny the allegations of the first sentence of Paragraph 142 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 142 and, therefore, demands strict proof thereof.

Caption II on page 50: Defendants deny the allegations in Caption II on page 50 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations therein and, therefore, demands strict proof thereof.

143. Defendants deny that they organized the referenced march. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 143 and, therefore, demands strict proof thereof.

144. Defendants lack sufficient information to admit or deny the allegations of Paragraph 144 and, therefore, demands strict proof thereof.

145. Defendants deny the allegations of Paragraph 145 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 145 and, therefore, demands strict proof thereof.

146. Defendants lack sufficient information to admit or deny the allegations of Paragraph 146 and, therefore, demands strict proof thereof.

147. Defendants deny any allegation that they were "instructed" to do anything and any allegation that they were a conspirator. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 147 and, therefore, demands strict proof thereof.

148. Defendants lack sufficient information to admit or deny the allegations of Paragraph 148 and, therefore, demands strict proof thereof.

149. Defendants deny the allegations of the first sentence of Paragraph 149 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 149 and, therefore, demands strict proof thereof.

150. Defendants deny the allegations of the first, second and third sentences of Paragraph 150 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 150 and, therefore, demands strict proof thereof.

151. Defendants lack sufficient information to admit or deny the allegations of Paragraph 151 and, therefore, demands strict proof thereof.

152. Defendants lack sufficient information to admit or deny the allegations of Paragraph 152 and, therefore, demands strict proof thereof.

153. Defendants lack sufficient information to admit or deny the allegations of Paragraph 153 and, therefore, demands strict proof thereof.

154. Defendants lack sufficient information to admit or deny the allegations of Paragraph 154 and, therefore, demands strict proof thereof.

155. Defendants lack sufficient information to admit or deny the allegations of Paragraph 155 and, therefore, demands strict proof thereof.

156. Defendants lack sufficient information to admit or deny the allegations of Paragraph 156 and, therefore, demands strict proof thereof.

157. Defendants deny any allegation in Paragraph 157 that they were a conspirator. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 157 and therefore, demands strict proof thereof.

158. Defendants deny the allegations of Paragraph 158 to the extent that they apply to them, including any allegations that they were a conspirator or that he "intended to threaten, intimidate and harass as many bystanders as possible." Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 158 and, therefore, demands strict proof thereof.

159. Defendants deny the allegations of Paragraph 159 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 159 and, therefore, demands strict proof thereof.

160. Defendants deny any allegation that they selected guards "for their willingness to 'get physical' with counter protesters." Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 160 and, therefore, demands strict proof thereof.

161. Defendants lack sufficient information to admit or deny the allegations of Paragraph 161 (which concern alleged observations by Plaintiffs) and, therefore, demands strict proof thereof.

162. Defendants deny the allegations of Paragraph 162 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 162.

163. Defendants deny the allegations of Paragraph 163 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 163 and, therefore, strict proof thereof.

164. Defendants lack sufficient information to admit or deny the allegations of Paragraph 164, as phrased, and, therefore, demands strict proof thereof.

165. Defendants deny the allegations of the first and second sentences of Paragraph 165 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 165 and, therefore, demands strict proof thereof.

166. Defendants deny the allegations of the first sentence of Paragraph 166 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 166 and, therefore, demands strict proof thereof.

167. Defendants lack sufficient information to admit or deny the allegations of Paragraph 167 and, therefore, demands strict proof thereof.

168. Defendants deny the allegation of the first sentence of Paragraph 168 to the extent that they apply to them and deny any allegation that they were conspirators. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 168 and, therefore, demands strict proof thereof.

169. Defendants deny any allegation that they threw fuel or tiki torches at anyone. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 170 (which concern a Plaintiff's alleged observations) and, therefore, demands strict proof thereof.

170. Defendants deny the allegations of Paragraph 170 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 170 and, therefore, demands strict proof thereof

171. Defendants deny the allegations of Paragraph 171 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 171 and, therefore, demands strict proof thereof.

172. Defendants deny the allegations of Paragraph 172 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 172 and, therefore, demands strict proof thereof.

173. Defendants deny the allegations of Paragraph 173 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 173 and, therefore, demands strict proof thereof.

174. Defendants deny any allegation that they were conspirators or that they sprayed mace on any person. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 174 and, therefore, demands strict proof thereof.

175. Defendants are not required to admit or deny the allegations of Paragraph 176 because they merely state opinions. To the extent that any response is required, Defendants deny the allegations of Paragraph 176 to the extent that they apply to them and states that, because they lack sufficient information to admit or deny said remaining allegations, they are unable to answer them and demands strict proof thereof.

176. Defendants lack sufficient information to admit or deny the allegations of Paragraph 175 and, therefore, demands strict proof thereof.

177. Defendants deny the allegations of Paragraph 177 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 177 and, therefore, demands strict proof thereof.

178. Defendants deny the allegations of Paragraph 178 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 178 and, therefore, demands strict proof thereof.

179. Defendants deny the allegations of Paragraph 179 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 179 and, therefore, demands strict proof thereof.

180. Defendants lack sufficient information to admit or deny the allegations of Paragraph 180 and, therefore, demands strict proof thereof.

181. Defendants deny the allegations of Paragraph 181 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 181 and, therefore, demands strict proof thereof.

182. Defendants lack sufficient information to admit or deny the allegations of Paragraph 182 and, therefore, demands strict proof thereof.

Caption (4) at page 59: Defendants lack sufficient information to admit or deny the allegations of said caption because they are ambiguous and, therefore, demands strict proof thereof.

183. Defendants lack sufficient information to admit or deny the allegations of Paragraph 183 and, therefore, demands strict proof thereof.

184. Defendants deny any allegation in Paragraph 184 that they were conspirators. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 184, and, therefore, demands strict proof thereof.

185. Defendants lack sufficient information to admit or deny the allegations of Paragraph 185 and, therefore, demands strict proof thereof.

186. Defendants deny the allegations of Paragraph 188 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 186 and, therefore, demands strict proof thereof.

Caption B(1) on page 61: Defendants deny the allegations in said caption.

187. Defendants deny the allegations of Paragraph 188 to the extent that they apply to them. Defendants deny the allegations of Paragraph 187 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 187 and, therefore, demands strict proof thereof.

188. Defendants deny the allegations of Paragraph 188 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 188 and, therefore, demands strict proof thereof.

189. Defendants deny the allegations of Paragraph 189 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 189 and, therefore, demands strict proof thereof.

190. Defendants lack sufficient information to admit or deny the allegations of Paragraph 190 and, therefore, demands strict proof thereof.

191. Defendants lack sufficient information to admit or deny the allegations of Paragraph 191 and, therefore, demands strict proof thereof.

192. Defendants deny the allegations of Paragraph 192 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 192 and, therefore, demands strict proof thereof.

193. Defendants deny the allegations of Paragraph 188 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 193 and, therefore, demands strict proof thereof.

Caption (2) at page 62: Denied.

194. Defendants deny the allegations of Paragraph 194 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 194 and, therefore, demands strict proof thereof.

195. Defendants admit meeting with others to travel to the park. Defendants deny the other allegations in Paragraph 195.

196. Defendants lack sufficient information to admit or deny the allegations of Paragraph 195 and, therefore, demands strict proof thereof.

197. Defendants admit traveling in a group to the park. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 197 and, therefore, demands strict proof thereof.

198. Defendants lack sufficient information to admit or deny the allegations in Paragraph 198 and, therefore, demands strict proof thereof.

199. Defendants lack sufficient information to admit or deny the allegations of Paragraph 199 and, therefore, demands strict proof thereof.

200. Defendants lack sufficient information to admit or deny the allegations of Paragraph 200, therefore, demands strict proof thereof.

201. Defendants deny the allegations of Paragraph 201 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 201 and, therefore, demands strict proof thereof.

202. Defendants deny the allegations of Paragraph 202 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 202 and, therefore, demands strict proof thereof.

203. Defendants deny the allegations of Paragraph 203 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 203 and, therefore, demands strict proof thereof.

204. Defendants lack sufficient information to admit or deny the allegations of Paragraph 204 and, therefore, demands strict proof thereof.

205. Defendants lack sufficient information to admit or deny the allegations of Paragraph 205 and, therefore, strict proof thereof.

206. Defendants deny the allegations of Paragraph 206 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 206 and, therefore, demands strict proof thereof.

207. Defendants deny the allegations of Paragraph 207 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 207 and, therefore, strict proof thereof.

208. Defendants deny the allegations of Paragraph 208 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 208 and, therefore, strict proof thereof.

209. Defendants deny the allegations of Paragraph 208 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 209 and, therefore, demands strict proof thereof.

210. Defendants deny the allegations of Paragraph 210 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 210 and, therefore, demands strict proof thereof.

211. Defendants deny the allegations of Paragraph 211 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 211 and, therefore, demands strict proof thereof.

212. Defendants admit making the statement.

213. Defendants deny the allegations of Paragraph 212 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 212 and, therefore, demands strict proof thereof.

214. Defendants lack sufficient information to admit or deny the allegations of Paragraph 214 and, therefore, demands strict proof thereof.

215. Defendants deny the allegations of Paragraph 215 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 215 and, therefore, demands strict proof thereof.

216. Defendants deny the allegations of Paragraph 216 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 216 and, therefore, demands strict proof thereof.

217. Defendants deny the allegations of Paragraph 217 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of

Paragraph 217 and, therefore, demands strict proof thereof.

218. Defendants lack sufficient information to admit or deny the allegations of Paragraph 218 and, therefore, demands strict proof thereof.

219. Defendants deny the allegations of Paragraph 219 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 219 and, therefore, demands strict proof thereof.

220. Defendants lack sufficient information to admit or deny the allegations of Paragraph 220 and, therefore, demands strict proof thereof.

221. Defendants deny the allegations of Paragraph 221 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 221 and, therefore, demands strict proof thereof.

222. Defendants deny the allegations of Paragraph 222 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 222 and, therefore, demands strict proof thereof.

Caption (3) on page 71: Defendants deny the allegations of said caption to the extent that they apply to them.

223. Defendants are not required to admit or deny the allegations of Paragraph 223 to the extent that they consist of a statement of law. Defendants admits that an unlawful assembly was declared, but deny all remaining allegations of Paragraph 223.

224. Defendants admit that Governor McAuliffe declared a state of emergency and made the quoted statement. Defendants deny all remaining allegations of Paragraph 224.

225. Defendants lack sufficient information to admit or deny the allegations of Paragraph 225 and, therefore, demands strict proof thereof.

226. Defendants deny the allegations of Paragraph 226 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 226 and, therefore, demands strict proof thereof.

227. Defendants lack sufficient information to admit or deny the allegations of Paragraph 227 and, therefore, demands strict proof thereof.

228. Defendants lack sufficient information to admit or deny the allegations of Paragraph 228 and, therefore, demands strict proof thereof.

229. Defendants lack sufficient information to admit or deny the allegations of Paragraph 229 and, therefore, demands strict proof thereof.

230. Defendants lack sufficient information to admit or deny the allegations of Paragraph 230 and, therefore, demands strict proof thereof.

231. Defendants deny the allegations of Paragraph 231 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 231 and, therefore, demands strict proof thereof.

232. Defendants lack sufficient information to admit or deny the allegations of Paragraph 232 and, therefore, demands strict proof thereof.

233. Defendants deny the allegations of Paragraph 233 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 233 and, therefore, demands strict proof thereof.

234. Defendants deny the allegations of Paragraph 234 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 234 and, therefore, demands strict proof thereof.

235. Defendants deny the allegations of Paragraph 234 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 235 and, therefore, demands strict proof thereof.

236. Defendants deny the allegations of Paragraph 236 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 236 and, therefore, demands strict proof thereof.

237. Defendants deny the allegations of Paragraph 237 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 237 and, therefore, demands strict proof thereof.

238. Defendants lack sufficient information to admit or deny the allegations of Paragraph 238 and, therefore, demands strict proof thereof.

239. Defendants lack sufficient information to admit or deny the allegations of Paragraph 239 and, therefore, demands strict proof thereof.

240. Defendants lack sufficient information to admit or deny the allegations of Paragraph 240 and, therefore, demands strict proof thereof.

241. Defendants lack sufficient information to admit or deny the allegations of Paragraph 241 and, therefore demands strict proof thereof.

242. Defendants deny the allegations of Paragraph 242 (including that any alleged act of Defendant Fields was "in furtherance of" any alleged conspiracy) to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 242 and, therefore, demands strict proof thereof.

243. Defendants lack sufficient information to admit or deny the allegations of Paragraph 243 and, therefore, demands strict proof thereof.

244. Defendants lack sufficient information to admit or deny the allegations of Paragraph 244 and, therefore, demands strict proof thereof.

245. Defendants lack sufficient information to admit or deny the allegations of Paragraph 245 and, therefore, demands strict proof thereof.

246. Defendants lack sufficient information to admit or deny the allegations of Paragraph 246 and, therefore, demands strict proof thereof.

247. Defendants lack sufficient information to admit or deny the allegations of Paragraph 247 and, therefore, demands strict proof thereof.

248. Defendants lack sufficient information to admit or deny the allegations of Paragraph 248 and, therefore, demands strict proof thereof.

249. Defendants lack sufficient information to admit or deny the allegations of Paragraph 249 and, therefore, demands strict proof thereof.

250. Defendants lack sufficient information to admit or deny the allegations of Paragraph 250 and, therefore, demands strict proof thereof.

251. Defendants lack sufficient information to admit or deny the allegations of Paragraph 251 and, therefore, demands strict proof thereof.

252. Defendants lack sufficient information to admit or deny the allegations of Paragraph 252 and, therefore, demands strict proof thereof.

253. Defendants lack sufficient information to admit or deny the allegations of Paragraph 253 and, therefore, demands strict proof thereof.

254. Defendants lack sufficient information to admit or deny the allegations of Paragraph 254 and, therefore, demands strict proof thereof.

255. Defendants lack sufficient information to admit or deny the allegations of Paragraph 255 and, therefore, demands strict proof thereof.

256. Defendants lack sufficient information to admit or deny the allegations of Paragraph 256 and, therefore, demands strict proof thereof.

257. Defendants lack sufficient information to admit or deny the allegations of Paragraph 257 and, therefore, demands strict proof thereof.

258. Defendants lack sufficient information to admit or deny the allegations of Paragraph 258 and, therefore, demands strict proof thereof.

259. Defendants deny the allegations of Paragraph 259 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 259 and, therefore, demands strict proof thereof.

260. Defendants admit the allegation in the last two sentences in Paragraph 260. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 260 and, therefore, demands strict proof thereof.

261. Defendants lack sufficient information to admit or deny the allegations of Paragraph 261 and, therefore, demands strict proof thereof.

Caption (5) on page 81: Denied.

262. Defendants deny the allegations of Paragraph 262 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 262 and, therefore, demands strict proof thereof.

263. Defendants lack sufficient information to admit or deny the allegations of Paragraph 263 and, therefore, demands strict proof thereof.

264. Defendants lack sufficient information to admit or deny the allegations of Paragraph 264 and, therefore, demands strict proof thereof.

265. Defendants lack sufficient information to admit or deny the allegations of Paragraph 265 and, therefore, demands strict proof thereof.

266. Defendants lack sufficient information to admit or deny the allegations of Paragraph 266 and, therefore, demands strict proof thereof.

267. Defendants lack sufficient information to admit or deny the allegations of Paragraph 267 and, therefore, demands strict proof thereof.

268. Defendants lack sufficient information to admit or deny the allegations of Paragraph 268 and, therefore, demands strict proof thereof.

269. Defendants lack sufficient information to admit or deny the allegations of Paragraph 269 and, therefore, demands strict proof thereof.

270. Defendants lack sufficient information to admit or deny the allegations of Paragraph 270 and, therefore, demands strict proof thereof.

271. Defendants lack sufficient information to admit or deny the allegations of Paragraph 271 and, therefore, demands strict proof thereof.

272. Defendants lack sufficient information to admit or deny the allegations of Paragraph 272 and, therefore, demands strict proof thereof.

273. Defendants lack sufficient information to admit or deny the allegations of Paragraph 273 and, therefore, demands strict proof thereof.

274. Defendants lack sufficient information to admit or deny the allegations of Paragraph 274 and, therefore, demands strict proof thereof.

275. Defendants lack sufficient information to admit or deny the allegations of Paragraph 275 and, therefore, demands strict proof thereof.

276. Defendants deny the allegations of Paragraph 276 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 276 and, therefore, demands strict proof thereof.

277. Defendants lack sufficient information to admit or deny the allegations of Paragraph 277 and, therefore, demands strict proof thereof.

Caption III on page 87: Denied.

Caption (A) on page 87: Denied.

278. Defendants deny the allegations of Paragraph 278 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 278 and, therefore, demands strict proof thereof.

279. Defendants deny the allegation of Paragraph 79 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 279 and, therefore, demands strict proof thereof.

280. Defendants deny the allegations of Paragraph 280 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 280 and, therefore, demands strict proof thereof.

281. Defendants deny the allegations of Paragraph 281 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 281 and, therefore, demands strict proof thereof.

282. Defendants lack sufficient information to admit or deny the allegations of Paragraph 282 and, therefore, demands strict proof thereof.

Caption (2) on page 88: Defendants lack sufficient information to admit or deny the allegations of said caption and, therefore, demands strict proof thereof.

283. Defendants lack sufficient information to admit or deny the allegations of Paragraph 283 and, therefore, demands strict proof thereof.

284. Defendants lack sufficient information to admit or deny the allegations of Paragraph 284 and, therefore, demands strict proof thereof.

285. Defendants lack sufficient information to admit or deny the allegations of Paragraph 285 and, therefore, demands strict proof thereof.

286. Defendants lack sufficient information to admit or deny the allegations of Paragraph 286 and, therefore, demands strict proof thereof.

287. Defendants lack sufficient information to admit or deny the allegations of Paragraph 287 and, therefore, demands strict proof thereof.

288. Defendants lack sufficient information to admit or deny the allegations of Paragraph 288 and, therefore, demands strict proof thereof.

289. Defendants lack sufficient information to admit or deny the allegations of Paragraph 289 and, therefore, demands strict proof thereof.

290. Defendantst lack sufficient information to admit or deny the allegations of Paragraph 290 and, therefore, demands strict proof thereof.

291. Defendants lack sufficient information to admit or deny the allegations of Paragraph 291 and, therefore, demands strict proof thereof.

292. Defendants lack sufficient information to admit or deny the allegations of Paragraph 292 and, therefore, demands strict proof thereof.

293. Defendants lack sufficient information to admit or deny the allegations of Paragraph 293 and, therefore, demands strict proof thereof.

294. Defendants lack sufficient information to admit or deny the allegations of Paragraph 294 and, therefore, demands strict proof thereof.

295. Defendants deny the allegations of Paragraph 295 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 295 and, therefore, demands strict proof thereof.

Caption (B) on page 94: Denied.

296. Defendants deny the allegations of Paragraph 296, as phrased, to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 296 and, therefore, demands strict proof thereof.

297. Defendants lack sufficient information to admit or deny the allegations of Paragraph 297 and, therefore, demands strict proof thereof.

298. Defendants lack sufficient information to admit or deny the allegations of Paragraph 298 and, therefore, demands strict proof thereof.

299. Defendants lack sufficient information to admit or deny the allegations of Paragraph 299 and, therefore, demands strict proof thereof.

300. Defendants lack sufficient information to admit or deny the allegations of Paragraph 300 and, therefore, demands strict proof thereof.

301. Defendants lack sufficient information to admit or deny the allegations of Paragraph 301 and, therefore, demands strict proof thereof.

302. Defendants lack sufficient information to admit or deny the allegations of Paragraph 302 and, therefore, demands strict proof thereof.

303. Defendants deny the allegations of the first sentence to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 303 and, therefore, demands strict proof thereof.

304. Defendants lack sufficient information to admit or deny the allegations of Paragraph 304 and, therefore, demands strict proof thereof.

305. Defendants lack sufficient information to admit or deny the allegations of Paragraph 305 and, therefore, demands strict proof thereof.

306. Defendants lack sufficient information to admit or deny the allegations of Paragraph 306 and, therefore, demands strict proof thereof.

307. Defendants lack sufficient information to admit or deny the allegations of Paragraph 307 and, therefore, demands strict proof thereof.

Caption (C) on page 96: Denied.

308. Defendants deny the allegations of Paragraph 308 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 308 and, therefore, demands strict proof thereof.

309. Defendants lack sufficient information to admit or deny the allegations of Paragraph 309 and, therefore, demands strict proof thereof.

310. Defendants lack sufficient information to admit or deny the allegations of Paragraph 310 and, therefore, demands strict proof thereof.

311. Denied.

312. Denied.

313. Denied.

314. Defendants lack sufficient information to admit or deny the allegations of Paragraph 315 and, therefore, demands strict proof thereof.

315. Defendants lack sufficient information to admit or deny the allegations of Paragraph 315 and, therefore, demands strict proof thereof.

316. Defendants lack sufficient information to admit or deny the allegations of Paragraph 316 and, therefore, demands strict proof thereof.

317. Defendants lack sufficient information to admit or deny the allegations of Paragraph 317 and, therefore, demands strict proof thereof.

318. Defendants deny the allegations to the extent they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 318 and, therefore, demands strict proof thereof.

319. Defendants lack sufficient information to admit or deny the allegations of Paragraph 319 and, therefore, demands strict proof thereof. Defendants deny the allegations to the extent they apply to them.

320. Defendants lack sufficient information to admit or deny the allegations of Paragraph 320 and, therefore, demands strict proof thereof.

321. Defendants deny the allegations to the extent they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 321 and, therefore, demands strict proof thereof.

322. Defendants deny the allegations of Paragraph 322 to the extent they apply to them and lack sufficient information to admit or deny the remaining allegations of Paragraph 322 and, therefore, demands strict proof thereof.

323. Defendants deny the allegations of Paragraph 323 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the allegations of Paragraph 323 and, therefore, demands strict proof thereof.

324. Defendants lack sufficient information to admit or deny the allegations of Paragraph 324 and, therefore, demands strict proof thereof.

325. Defendants deny the allegations of Paragraph 325 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 325 and, therefore, demands strict proof thereof.

326. Defendants admit that Hill was featured in a promotion poster.

327. Defendants deny the allegations of Paragraph 328 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 328 and, therefore, demands strict proof thereof.

328. Defendants deny the allegations of Paragraph 328 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 328 and, therefore, demands strict proof thereof.

329. Defendants admit that the referenced persons "attended and participated" in a torchlight parade, but deny all remaining allegations of Paragraph 329.

330. Defendants lack sufficient information to admit or deny the allegations of Paragraph 330 and, therefore, demands strict proof thereof.

331. Defendants deny the allegations of Paragraph 331 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 331 and, therefore, demands strict proof thereof.

332. In response to the first sentence of Paragraph 332, Defendants admit that they attended and participated in some aspect of the rally on August 12, but deny all remaining allegation of said sentence. Defendants lack sufficient information to admit or deny the allegations of the second sentence of Paragraph 332 and, therefore, demands strict proof thereof.

333. Defendants deny the allegations of Paragraph 333 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 333 and, therefore, demands strict proof thereof.

334. Defendants deny the allegations of Paragraph 334 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 334 and, therefore, demands strict proof thereof.

335. Defendants incorporate herein by reference their responses to Paragraphs 1 through 335 of the Second Amended Complaint as if said responses were fully set forth herein.

336. Denied.

337. Denied.

338. Denied.

339. Denied.

340. Denied.

341. Denied, including with respect to the allegation that, pursuant to the 13th Amendment to the United States Constitution, Plaintiffs have "rights to be free of the badges and incidents of slavery." Absent enactment by Congress of legislation under Section 2 of the 13th Amendment by which the Congress bans some badge or incident of slavery, there is no

civilly enforceable right to be free or such a badge or incident and, therefore, no cause of action exist under 42 U.S.C. Section 1985(3) or 42 U.S.C. Section 1986.

342. Denied.

343. Denied.

344. Defendants incorporate herein by reference their responses to Paragraphs 1 through 343 of the Second Amended Complaint as if said responses were fully set forth herein.

345. Denied.

346. Denied.

347. Denied.

348. Denied.

349. Denied.

350. Denied.

351. Defendants incorporate herein by reference their responses to Paragraphs 1 through 349 of the Second Amended Complaint as if said responses were fully set forth herein.

352. Denied.

353. Denied.

354. Denied.

355. Denied.

356. Defendants incorporate herein by reference their responses to Paragraphs 1 through 353 of the Second Amended Complaint as if said responses were fully set forth herein.

357 through 363. Defendants are not required to admit or deny the allegations of Paragraphs 357 through 363 because they are not directed to them. If, however, any response is required Defendants states as follows: (a) they lack sufficient information to admit or deny the

factual allegations of said paragraphs and, therefore, demands strict proof thereof; and (b) they are not required to admit or deny the remaining allegations because they merely constitute statements of law.

364. Defendants incorporate herein by reference their response to Paragraphs 1 through 362 of the Second Amended Complaint as if said responses were fully set forth herein.

365. Defendants are not required to admit or deny the allegations of Paragraph 363 because they merely state a legal conclusion.

366. Defendants deny the allegations of Paragraph 364 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 364 and, therefore, demands strict proof thereof.

367. Defendants deny the allegations of Paragraph 365 to the extent that they are directed to them. Defendants lack sufficient information to admit or deny the remaining allegations of Paragraph 365 and, therefore, demands strict proof thereof.

368. Defendants incorporate herein by reference their responses to Paragraphs 1 through 365 of the Second Amended Complaint as if said responses were fully set forth herein.

369. Defendants deny the allegations in Paragraph 367 to the extent that they apply to them. Defendants lack sufficient information to admit or deny the remaining allegations Paragraph 367 and, therefore, demands strict proof thereof.

370. Defendants incorporate herein by reference their responses to Paragraphs 1 through 367 of the Second Amended Complaint as if said responses were fully set forth herein.

371. Defendants are not required to admit or deny the allegations of Paragraph 369 because they are not directed to them.

372. Defendants are not required to admit or deny the allegations of Paragraph 372 because they are not directed to them.

373 through 377. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendants deny Plaintiffs are entitled to the relief requested.

SECOND DEFENSE

378. The Second Amended Complaint fails to state a claim for which relief can be granted, in part, because:

- a. Plaintiffs do not allege the violation of any right protected against infringement by private actors.
- b. The United States Congress has not enacted any legislation proscribing, or creating a private cause of action with respect to, the putative badges and incidents of slavery alleged herein (such as a putative right to be free of racially motivated violence).
- c. Those Plaintiffs who are not African American do not have any rights under the 13th Amendment to the United States Constitution to be free from alleged badges and incidents of slavery.
- d. Section 8.01-42.1, Code of Virginia, is overly broad and unduly vague and, therefore, violates the 1st, 5th and 14th Amendments to the United States Constitution and Article I, Sections 11 and 12 of the Constitution of Virginia.
- e. Plaintiffs have not adequately pleaded either statutory conspiracy under Section 1985(3) or common law conspiracy under Virginia law.

f. Defendants incorporate herein by reference the arguments that they set forth in their earlier Motion to Dismiss and that counsel for Defendants stated in oral argument thereon.

THIRD DEFENSE

379. Any allegation not expressly and unequivocally admitted herein is hereby denied.

FOURTH DEFENSE

380. Defendants did not conspire with any person.

FIFTH DEFENSE

381. Defendants did engage in any tortious or illegal acts; Defendants did not encourage or incite any tortious or illegal acts; and Defendants did not conspire to affect the commission of any tortious or illegal acts.

SIXTH DEFENSE

382. All alleged statements by Defendants are forms of speech protected under the 1st and 14th Amendments to the United States Constitution and under Article I, Section 12 of the Constitution of Virginia.

SEVENTH DEFENSE

383. Any communications, including meetings, between Defendants and any other alleged conspirator are forms of association protected under the 1st and 14th Amendments to the United States Constitution and Article I, Section 12 of the Constitution of Virginia.

EIGHTH DEFENSE

384. Defendants did not know of any alleged wrongs about to be committed pursuant to the alleged conspiracies.

NINTH DEFENSE

385. Defendants did not have the power to prevent or aid in the prevention of any alleged wrongs about to be committed pursuant to the alleged conspiracies.

TENTH DEFENSE

386. Defendants did not have the power to prevent or aid in the prevention and/or termination of the alleged conspiracies.

ELEVENTH DEFENSE

387. Plaintiffs assumed the risk of the injuries of which they complain and, therefore, their claims are barred.

TWELFTH DEFENSE

388. Plaintiffs were contributorily negligent and, therefore, their claims are barred.

THIRTEENTH DEFENSE

389. Any injuries allegedly sustained by Plaintiffs were proximately caused by persons other than Defendants and over whom Defendants had no control or for whom Defendants do not have any legal responsibility (such as Plaintiffs themselves, Defendants Fields and/or one or more law enforcement agencies). On or more of said other causes constitute(s) a superseding cause.

FOURTEENTH DEFENSE

390. Any alleged injuries to Plaintiffs are not as severe or extensive as alleged by Plaintiffs.

FIFTEENTH DEFENSE

391. One or more causes of injury to Plaintiffs and/or injuries to Plaintiffs were not reasonably foreseeable by Defendants.

SIXTEENTH DEFENSE

392. The alleged acts of Defendants Fields were not reasonably foreseeable by Defendants.

SEVENTEENTH DEFENSE

393. Any alleged acts of Defendants Fields and any acts of violence other than those in self-defense were not objects of any alleged conspiracy.

EIGHTEENTH DEFENSE

394. Any injunctive relief against Defendants would constitute an unconstitutional prior restraint on protected speech.

NINETEENTH DEFENSE

395. Defendants reserves the right to assert any other defense, whether affirmative or otherwise, and hereby notifies Plaintiffs that he will invoke any other defense supported by the facts, whether now known or adduced in discovery and/or at trial.

WHEREFORE, the premises considered, Defendants Michael Hill, Michael Tubbs, and League of the South, Inc. request the following relief:

- a. entry of a judgment in favor of Defendants against each Plaintiff and dismissal of the Second Amended Complaint with prejudice;
- b. an award of all taxable costs; and
- c. an award of such other or further relief as this Court might deem just and proper.

Respectfully submitted,

Michael Hill,

Michael Tubbs,

League of the South, Inc.

By: ___/s/ Bryan Jones_____
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CERTIFICATE OF SERVICE

I hereby certify that, on Oct. 1, 2019 , I filed the foregoing Answer and Grounds of Defense with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing of this pleading to all counsel of record, including the following:

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